

## REMARKS

Claims 1-20 were pending in the application. Claims 1, 2, 4, 6-8, 11 and 16-18 have been amended, and claims 3, 5 and 9-10 have been cancelled. Favorable reconsideration and allowance of this application is respectfully requested in light of the amendments and the foregoing remarks.

1. **Rejections under 35 U.S.C. § 112, second paragraph**

Claims 1-10 and 19 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. Specifically, the Examiner indicates that the recitation “a fabric whose warp and/or weft having alternating types of thread” in claim 1 is unclear whether this sequence includes a warp comprising type A threads and a weft comprising type B threads, and that such threads alternate, or whether the warp must have one set of alternating threads and the weft having a different set of alternate threads. In addition, the Examiner indicates that the recitation “these types of thread have material with high temperature stability” is unclear because it is relative as to what high temperature must the material have stability in order to qualify. In claim 19, the Examiner indicates that the recitation “at least one core is essentially made of Polymide” contradicts the recitation “a core that is essentially made of metal” in claim 18 from which claim 19 depends. The Examiner alleges that Polymide is not a metal.

Applicants have amended claims 1, 11 and 18 to place in better form. Specifically, claims 1, 11, and 18 have been amended to clarify that the warp or the weft includes a pattern of alternating threads, or that the warp and weft each includes a

pattern of alternating threads. In view of the amendments, reconsideration and withdrawal of the rejections is respectfully requested.

**2. Rejections in view of alleged prior art**

Claims 1-2, 4, 6, 8, 11, 13, 15-16, 18, and 20 stand rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by U.S. Publication No. 2001/0029139 to Espe (herein the Espe publication). Claims 7, 14 and 19 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over the Espe publication in view of U.S. Patent No. 5,855,733 to Douglas et al. (herein the Douglas et al. patent). Applicant respectfully traverses the rejections for the following reasons.

Claim 1 as amended recites a press pad having a fabric whose warp and/or weft each includes a pattern of alternating types of thread, the pattern repeating itself in the fabric, characterized in that the pattern of alternating types of threads includes at least two types of thread of different elasticities transverse to the thread axis, each type of thread comprising a sheath made of an elastomeric material and a core with a higher tensile strength than the sheath.

The Espe publication does not disclose press pad comprised of a fabric having a pattern of alternating types of thread, the pattern repeating itself in the fabric, characterized in that the pattern of alternating types of threads includes at least two types of thread of different elasticities transverse to the thread axis. In regard to the present invention, the recited core and sheath configuration of each thread, in combination with the recited types of threads having different elasticities in the direction transverse to the thread axis, provides an enhanced localized elasticity and strength for the press pad. A

review of the remaining cited references fails to teach or suggest this limitation. Thus, the cited references do not teach or suggest each every limitation of the claimed invention. Therefore, reconsideration and withdrawal of the rejection of claim 1 is respectfully requested.

Claims 2, 4, and 6-8 depend either directly or indirectly from claim 1 and are believed allowable for the same reasons that claim 1 is believed allowed. Claims 2, 4, and 6-8 may include patentable subject matter in addition to claim 1. For example, the cited references do not teach a core where Polyimide is a substitute for metal as recited in claim 7. Rather, the Douglas et al. patent discloses that metal fibers may be wrapped by an aromatic Polyimide yarn (arguably a sheath) (col. 4, lines 41-46).

Claim 11 as amended recites a press pad comprising a warp interwoven with a weft, the warp and/or the weft each including a pattern of alternating types of threads having differing elasticities transverse to a thread axis. Each type of thread includes a core and a polymer material at least on its lateral surface. The pattern of alternating types of threads repeats itself.

For reasons similar to those described above for claim 1, the cited references do not teach or suggest a press pad comprising a warp including a pattern of alternating types of threads each having differing elasticities transverse to a thread axis as recited in claim 11. Therefore, reconsideration and withdrawal of the rejection is respectfully requested.

Claims 12-17 depend either directly or indirectly from claim 11 and are believed allowable for the same reasons that claim 11 is believed allowed. Claims 12-17 may include patentable subject matter in addition to claim 11.

Claim 18 as amended recites a press pad with improved pressure compression having a warp; weft in communication with the warp; and wherein the warp and/or the weft includes an alternating pattern of at least two types of threads of differing elasticities transverse to the thread axis, each type of thread having 1) a sheath that is an elastomer and has a high temperature stability above 200 degrees Celsius, and 2) a core, wherein the core has a higher tensile strength than the sheath.

For reasons similar to those described above for claim 1, the cited references do not teach or suggest each and every limitation recited in claim 18. For example, none of the cited references teach or suggest a press pad having a warp and/or a weft includes an alternating pattern of at least two types of threads of differing elasticities transverse to the thread axis. Therefore, reconsideration and withdrawal of the rejections is respectfully requested.

Claims 19-20 depend either directly or indirectly from claim 18 and are believed allowable for the same reasons that claim 18 is believed allowed. Claims 19-20 may include patentable subject matter in addition to claim 18.

### **CONCLUSION**

It is submitted that claims 1-2, 4, 6-8 and 11-20 define patentable subject matter. A Notice of Allowance is therefore respectfully requested.

No fee is believed due with this communication. Nevertheless, should the Examiner consider any other fees to be payable in conjunction with this or any future communication, authorization is given to direct payment of such fees, or credit any overpayment to Deposit Account No. 50-1170.

The Examiner is invited to contact the undersigned by telephone if it would help expedite matters.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael J. Gratz", with a stylized flourish at the end.

Michael J. Gratz  
Reg. No. 39,693

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BOYLE, FREDRICKSON, NEWHOLM,  
STEIN & GRATZ S.C.  
250 Plaza, Suite 1030  
250 East Wisconsin Avenue  
Milwaukee, WI 53202  
Telephone: (414) 225-6306  
Facsimile: (414) 225-9753